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March 29, 2024

VIA ECF

Hon. J. Paul Oetken
United States District Judge
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 706
New York, NY 10007

Re: Troche v. Rinse, Inc., 1:24-cv-00057-JPO

Your Honor:

We represent Defendant Rinse, Inc. ("Rinse") in the above-referenced action. Pursuant to Your Honor's Individual Practices in Civil Cases, we write with the consent of counsel for Plaintiff Veronica Troche respectfully to request that the Court extend Rinse's time to respond to the Complaint from March 31, 2024 to April 30, 2024. In support of this request, counsel for Rinse states that the parties are continuing to engage in productive discussions about an early resolution of this action and have made significant progress toward a resolution. If granted, this extension will permit the parties to focus on those efforts, which may resolve this action without the need for further pleading and court intervention. This is Rinse's third request for an extension of time to respond to the Complaint. The Court granted Rinse's prior requests. If granted, this extension will not affect any other dates scheduled in this action.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

/s/ Michael F. Fleming

Michael F. Fleming

C: All Counsel of Record (via ECF)

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